REMARKS

Claims 1, 16 and 31-45 have been amended. Claims 1-45 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Regarding claim 1, neither Carre nor Shank discloses a **platform-independent interface configured to provide for <u>selection, from a plurality of different formats, of a format for delivery of the messages</u> for each manager in a format <u>selected by that manager</u>**. Similarly, in regards to claims 16 and 31, Carre and Shank both fail to disclose **managers <u>selecting, from a plurality of different formats, a format for messages deliverable by a gateway</u> between managed objects and each of the managers and delivering the messages between the managed objects and the managers, <u>according to the format selected by each manager</u>**.

Carre pertains to address conversion between CORBA objects and OSI objects (Carre - col. 1, lines 9-19; col. 1, line 59 - col. 2, line 46) and to the transforming of object interfaces column 5, lines 49-59). Specifically, Carre teaches that address conversion is performed according to the type of objects that are communicating. There is no ability in Carre for the <u>managers</u> to <u>select</u> a desired message delivery format from a plurality of different formats. The sections cited by the Examiner (col. 5, lines 49-59 and col. 6, lines 30-35) refer to address-type conversion between CORBA objects and OSI objects. There is absolutely no mention in Carre of managers being able to select, from a plurality of different formats, the format for messages delivered by the gateway. Nor does Carre does not describe any mechanism by which a manager can select a format for messages from a plurality of different formats.

Additionally, the gateway in Carre is not capable of delivering messages in formats selected by the managers from a plurality of different formats. Furthermore, Carre's interfaces are not message formats. Even if a manager in Carre could select a different interface, which Applicants assert they cannot, such a selection would still not be selecting a format for message delivery as the Examiner contends. Object interfaces

and message formats are different things. In Carre's invention, different interfaces are provided specifically to allow different object types (specifically OSI or non-CORBA object) to access and send message through a single CORBA infrastructure. Carre's system is quite different from a gateway configured to deliver the message for each manager *in a format selected by that manager* from a plurality of different formats.

The Decision on Appeal dated October 17, 2006 refers to the fact that applicants' claims (as recited at the time of appeal) only recited "passive selectivity" and "no positive recitation of any selection by any manager from among a plurality of different formats." When discussing the teaching of Carre the Decision on Appeal also states, "the format that the given manager operates in would have been automatically selected according to the translations of Carre" (Decision on Appeal dated October 17, 2006, page 6). Thus, the Decision on Appeal clearly implies that Carre fails to disclose managers selecting a format from among a plurality of different format and also fails to disclose a gateway configurable to deliver the messages for each manager in a <u>format selected from a plurality of different formats by that manager</u>.

Shank pertains to providing telephony and media services from a server 110 to an application 140 (Shank, Figure 1, column 1, lines 13-18). According to Shank, a server may include various service interfaces, such as telephony services 210, media services 220, and basic services 230 that a client may use. Shank's system provides a CORBA ORB 260 for communicating with these interfaces (col. 3, line 31 - col. 4, line 13). As described in Shank, the service interfaces (such as telephony services 210 and media services 220) allow client application 140 to interact with services such as telephone services provided on telephone network 105 and media services provided by various hardware components (col. 7, lines 15-28). Shank only discusses the client-server interactions between application 140 and server 110. In other words, Shank discusses providing telephony and media services through a server to a client application. As discussed above, Shank's interfaces 210, 220, 230 provide service interfaces for an application 140.

Like Carre, Shank fails to disclose managers *selecting a format from among a plurality of different formats*. Shank also fails to disclose any platform-independent interface configured to provide for *selection by a manager of a format from a plurality of formats*. Additionally, Shank does not disclose delivering messages between managed object and managers *according to a format selected by each manager*.

Furthermore, the Decision on Appeal dated October 17, 2006 states that Shank's service interface "communicates in a format determined or otherwise selected by the manager ... especially since the selectability that is required of representative independent claim 1 on appeal is not said to selectively choose from among a plurality of options" (Decision on Appeal dated October 17, 2006, page 10). Thus, the Decision of Appeal implies that selectively choosing a format from among a plurality if different formats, as currently recited by claim 1, is not disclosed by Shank. Similarly, Carre, as discussed above, does not including selecting a format from a plurality of different formats.

Thus, as noted above, neither Shank nor Carre, discloses a platform-independent interface configured to provide for selection, from a plurality of different format, of a format for delivery of the messages for each manager in a format selected by that manager. Shank and Carre also fail to disclose managers selecting a format from a plurality of different formats and delivering messages between managed objects and managers, according to the format selected by each manager, as recited in Applicants' claims.

Moreover, Shank does not teach that each managed object is a computer programming language object representing one or more devices on a network, wherein each manager is configured to send request messages to and receive event messages from one or more of the managed objects. Instead, Shank just refers to transmitting an object-oriented, language-independent request to a server to invoke a function on a resource coupled to the server.

CONCLUSION

Applicants submit the application is in condition for allowance, and prompt notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-61100/RCK.

Also enclosed herewith are the following items:

☐ Return Receipt Postcard

☐ Petition for Extension of Time

☐ Notice of Change of Address

☐ Fee Authorization Form authorizing a deposit account debit in the amount of $ for fees (   ).

☐ Other:

Respectfully submitted,

/Robert C. Kowert/
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